

From: Sarah A. Zylstra
Sent: Friday, September 23, 2022 11:48 AM
To: Ingrisano, Jonathan; Tanner G. Jean-Louis
Cc: Noel Sterett; Knapp, Bruce; Wittenwyler, Mike
Subject: RE: EHS -- revised key word search [GK-Active.FID3018047]

Jonathon,

We will get you some samples regarding the word permit.

We will run the two new searches and let you know the results (hopefully later this afternoon).

In addition, we will continue to work with you on any further refinement of the search. However, we still feel we need to get a motion on file today. It is now less than 30 days from the deadline of production. By the time we brief the issues and Magistrate Crocker decides them, at best we will have 3 weeks to respond and may have less than that. We are happy to withdraw the motion if we can come to agreement while it is pending.

Thanks,

Sarah



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From: Ingrisano, Jonathan <jingrisa@gklaw.com>
Sent: Friday, September 23, 2022 10:24 AM
To: Sarah A. Zylstra <szylstra@boardmanclark.com>; Tanner G. Jean-Louis < TJeanLouis@boardmanclark.com>
Cc: Noel Sterett <nsterett@daltonmich.com>; Knapp, Bruce <BKnap@gklaw.com>; Wittenwyler, Mike <mwittenw@gklaw.com>
Subject: RE: EHS -- revised key word search [GK-Active.FID3018047]

Sarah:

Given the additional detail you provided, and further given the limitations you've acknowledge in the City's search capabilities, we would suggest the following:

**EXHIBIT
B**

First, we could break up the single search into two to narrow the “permit” search.

1. ((Edgewood OR EHS) AND permit AND (light* OR field OR Goodman OR stadium OR electric* OR games OR athletic OR appli* OR practice OR class)) OR “Edgewood permit”
2. (Edgewood OR EHS) AND (“master plan” OR light* OR field OR stadium OR ordinance)

Second, EHS would agree that for the City alders’ inboxes – except Tag’s – you can restrict the searches to those that are “from” or “cc / bcc” the alder accounts. This will eliminate all of that 20% of the emails received from constituents, but would still capture the alders’ responses, forwards, and internal emails.

Third, the City should be able to de-dupe its hits from those it has already produced.

Jonathan Ingrisano | Attorney
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From: Ingrisano, Jonathan
Sent: Friday, September 23, 2022 9:51 AM
To: Sarah A. Zylstra <szylstra@boardmanclark.com>; Tanner G. Jean-Louis <TJeanLouis@boardmanclark.com>
Cc: Noel Sterett <nsterett@daltontomich.com>; Knapp, Bruce <bknapp@gklaw.com>; Wittenwyler, Mike <mwittenw@gklaw.com>
Subject: RE: EHS -- revised key word search [GK-Active.FID3018047]

Sarah:

Based on some of the new details you are providing below, I am exploring some alternative searches and will have something for you today. As part of that, can you give me some examples of where (“Edgewood” OR “EHS”) AND “permit” was overly inclusive within that date range?

Jonathan

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From: Sarah A. Zylstra <szylstra@boardmanclark.com>
Sent: Thursday, September 22, 2022 4:00 PM
To: Ingrisano, Jonathan <jingrisa@gklaw.com>; Tanner G. Jean-Louis <TJeanLouis@boardmanclark.com>
Cc: Noel Sterett <nsterett@daltontomich.com>; Knapp, Bruce <BKnapp@gklaw.com>; Wittenwyler, Mike <mwittenw@gklaw.com>
Subject: RE: EHS -- revised key word search [GK-Active.FID3018047]

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Jonathan,